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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
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Preparation for International Telecommunication Union World Radiocommunication Conferences	)	ET Docket No. 93-198

REPLY COMMENTS OF
AMSC SUBSIDIARY CORPORATION AND AMERICAN MOBILE RADIO CORPORATION

AMSC Subsidiary Corporation ("AMSC") and American Mobile Radio Corporation ("AMRC")[1/] hereby submit their reply to the comments filed on the Notice of Inquiry concerning the 1993 World Radiocommunication Conference ("WRC-93") of the International Telecommunication Union ("ITU"). The comments (including that of AMSC and AMRC) demonstrate considerable support for a limited agenda at the 1995 World Radiocommunication Conference that focuses on facilitating the use of existing MSS allocations in the 1-3 GHz band, consideration of new, additional MSS allocations and review of the report of the Voluntary Group of Experts. As discussed below, AMSC disagrees with Arinc's continued attempts to revisit the use of generic MSS allocations. AMSC also cautions against any attempt to change the 1996 date for implementation of new MSS allocations in the United States or

MHz to worldwide allocations. Finally, AMSC agrees that there is a need to address PFD limits at 2483.5-2500 MHz and AMRC supports the early submittal of appropriate Advance Publication documents to the Radiocommunication Board of the ITU for U.S. DARS systems.

Generic MSS allocations. Aeronautical Radio, Inc. ("Arinc") repeats its argument that the U.S. should not pursue generic MSS allocations in the 1530-1559/1626.5-1660.5 MHz bands, claiming that the international community opposes generic allocations and that generic allocations jeopardize the provision of safety communications in these bands.

Arinc is wrong. The international community increasingly supports generic MSS allocations. Except for portions of the 1530-1559/1626.5-1660.5 MHz bands, all other regional and worldwide mobile satellite allocations are generic. WARC-92 allocated the 1530-1544/1626.5-1645.5 MHz bands to generic MSS in the United States, Argentina, Australia, Brazil, Canada, Malaysia, and Mexico (RR 726C) and allocated the 1555-1559/1656.5-1660.5 MHz band to generic MSS in the United States, Argentina, Canada, Australia and Mexico (RR 730B, RR 730C). There are also generic MSS allocations in the 1525-1530/1626.5-1631.5 MHz bands in both Regions 1 and 3, and worldwide generic MSS allocations in the 1544-1545/1645.5-1646.5 MHz bands. In addition, non-safety aeronautical communications are permitted in the 1545-1555/1646.5-1656.5 MHz bands (RR729A). All regional MSS systems in the 1530-1559/1626.5-1660.5 MHz bands will be generic,

including those to be operated by AMSC, Canada, Mexico and Australia.

Moreover, safety communications in the 1530-1559/1626.5-1660.5 MHz bands are protected by the requirement that systems provide priority and preemptive access to those safety communications. See RR 726C, RR 730C. AMSC's system meets the stringent requirements of the Federal Aviation Administration and the aeronautical community for the protection of aeronautical safety communications. See AMSC Application for Transmit/Receive Earth Station, File Nos. 445-DSE-P/L-93, 446-DSE-AMEND-93; AMSC Application for Blanket License for 200,000 Mobile Earth Stations, File No. 2823-DSE-P/L-93. Similarly, AMSC has been working with the maritime community, including the Coast Guard, to develop standards that will permit AMSC to participate in the Global Maritime Distress and Safety System, another example of a generic MSS system being used to provide safety communications.

AMSC opposes Arinc's suggestion that Resolution 208 be suppressed. Resolution 208 provides for countries to maintain their sovereignty over use of the L-band and thus should be

See RR 746C and RR 746B, respectively. The current MSS allocation in the 1492-1525 MHz and 1675-1710 MHz bands also is limited to Region 2. Some commenters suggest that the MSS allocations should be available worldwide and with implementation dates prior to 2005.[2/]

Regardless of what happens to the 2005 implementation date, AMSC strongly recommends against any change in the January 1, 1996 implementation date for the United States. AMSC believes that the 2 GHz allocations provide an important opportunity for MSS expansion, including second generation domestic systems that will be part of the family of Personal Communications Services. Satellites alone have the ability to ensure that new technology will be brought to all parts of this country, including those where terrestrial systems will never be constructed, and such satellite systems should be operational in the 1996 timeframe.[3/]

2/ See Comments of Motorola, Loral Qualcomm.

3/ AMSC opposes Comsat's suggestion the WRC-93 adopt a resolution that would permit provisional arrangements to allow coordination of these bands pending final action at WRC-95. The purpose of WRC-93 is to set the agenda for WRC-95 and tentatively for WRC-97, not to address substantive issues. There are two problems with addressing substantive issues. First, to do so would open the door for other administrations to raise substantive issues, detracting from the focus of the meeting. Second, the U.S. will not be prepared to address substantive issues at WRC-93. In any event, Inmarsat made a similar proposal at the Additional Plenipotentiary Conference in December 1992, and the proposal was soundly rejected. A compromise was reached to address the issue at WRC-95, and, as such, WRC-95 is the appropriate forum for Comsat's proposal.

AMSC also disagrees with the proposal of the Utilities Telecommunications Council that the Commission license only

With respect to proposals to convert Region 2 MSS allocations to worldwide allocations, the U.S. should bear in mind that a significant portion of the demand for MSS will be in Region 2, particularly in North America. In fact, three North American MSS systems will be implemented by 1995 (U.S., Canada and Mexico) and the Inmarsat system has significant resources in Region 2. The U.S. benefits from the Region 2-only allocations because more of the allocated spectrum will be available for U.S. MSS systems since there will be fewer systems worldwide with which to coordinate.

Power Flux Density ("PFD") at 2483.5-2500 MHz. AMSC agrees with Loral Qualcomm and Constellation Communications that WRC-95 should address the PFD issue at 2483-2500 MHz, though it is too early to recommend appropriate PFD levels at this point in the Radiocommunication Sector ("RS") studies. To this end, AMSC is analyzing the interference associated with PFD levels required for geostationary MSS satellites.[4/] AMSC's analysis will be submitted to the RS to assist in the development of a Task Group 12/4 Recommendation for sharing between MSS and the fixed service.

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terrestrial systems in these bands. It has always been the Commission's expectation that MSS will be part of spectrum allocated for new technologies. See Notice of Proposed Rulemaking, 7 FCC Rcd 1542 (1992).

4/ See Documents USWP 9D/7 and 9D/8 (July 15, 1993).

4) Advance Publish Digital Audio Radio Service system. AMRC supports the recommendations of Satellite CD Radio, Inc. and Digital Satellite Broadcasting Corporation that the U.S. Advance Publish with the ITU a generic Digital Audio Radio Service ("DARS") system in the 2310-2360 MHz band.[5/] Advance Publication may allow U.S. systems to gain existing system status with special rights in case other countries join the U.S. allocation in the 2.3 GHz band. AMRC is concerned, however, that under RR 1503, the ITU Radiocommunication Board must reject any frequency assignment notification for use of the lower 25 megahertz of the band before 1998 in contravention of Resolution 528. Thus, the U.S might consider submitting two advance publications, one for use of the upper 25 megahertz for a system launched before 1998 and one for use of the entire band after 1998.

5/ This generic system should be based on the four pending applications to construct DARS systems in the 2310-2360 MHz band and approved by all four applicants, so as not to be prejudicial with respect to any of the proposed systems.

Conclusion

As discussed above, the agenda for WRC-95 should focus on facilitating the use of MSS allocations in the 1-3 GHz band and adopting new MSS allocations.

Respectfully submitted,

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Dated: July 29, 1993

CERTIFICATION OF SERVICE

I, Leslie B. Payne, a secretary in the law firm of Fisher, Wayland, Cooper and Leader, do hereby certify that true copies of the foregoing **"REPLY COMMENTS"** were sent this 29th day of July, 1993, by first Class United States Mail, postage prepaid, to the following:

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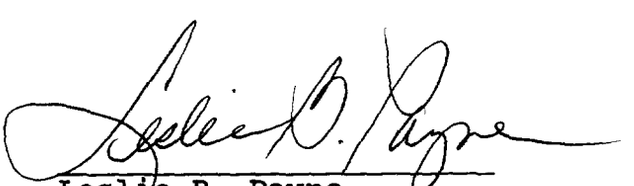

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